

EXHIBIT “A”

IN RE TESLA INC. SECURITIES LITIGATION, Case No. 18-cv-04865 (EMC)
PLAINTIFF'S REVISED PROPOSED VERDICT FORM

VERDICT FORM

A. RULE 10B-5 CLAIM: LIABILITY

Statement No. 1: "Am considering taking Tesla private at \$420. Funding secured."

1. Have Plaintiffs proved their Rule 10b-5 Claim against Elon Musk for Statement No. 1 identified above?

Yes: _____ No: _____

2. Have Plaintiffs proved their Rule 10b-5 Claim against Tesla Inc. for Statement No. 1 identified above?

Yes: _____ No: _____

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Statement No. 2: "Investor support is confirmed. Only reason why this is not certain is that it's contingent on a shareholder vote."

3. Have Plaintiffs proved their Rule 10b-5 Claim against Elon Musk for Statement No. 2 identified above?

Yes: _____ No: _____

4. Have Plaintiffs proved their Rule 10b-5 Claim against Tesla Inc. for Statement No. 2 identified above?

Yes: _____ No: _____

IF YOU CHECKED "YES" FOR ONE OR MORE QUESTIONS IN
STATEMENT NOS. 1 OR 2, PROCEED TO THE NEXT PAGE.

IF YOU CHECKED "NO" FOR EVERY QUESTION IN
STATEMENT NOS. 1 AND 2, PROCEED TO SECTION E ON PAGE 8.

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B. RULE 10B-5 CLAIM: DAMAGES

1. Determine the amount of artificial inflation per share of Tesla stock proved by Plaintiffs on each date during the Class Period and write it in the table below.

	07-Aug	08-Aug	09-Aug	10-Aug	13-Aug	14-Aug	15-Aug	16-Aug	17-Aug
(\$/share)	\$____.	\$____.	\$____.	\$____.	\$____.	\$____.	\$____.	\$____.	\$____.

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2. Determine the amount of artificial inflation per Tesla corporate bond proved by Plaintiffs on each date during Class Period and write it in the table below

	07-Aug	08-Aug	09-Aug	10-Aug	13-Aug	14-Aug	15-Aug	16-Aug	17-Aug
2019 Note									
2021 Note									
2022 Note									

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C. SECTION 20(A) CLAIM: LIABILITY

If you answered "Yes" to one or more of questions 2 or 4 in Section A, please answer the following question.

1. Have Plaintiffs proved their Section 20(a) Claim against any of the Tesla directors (check all that apply)?

Brad W. Buss:	Yes: _____	No: _____
Robyn Denholm:	Yes: _____	No: _____
Ira Ehrenpreis:	Yes: _____	No: _____
Antonio Gracias:	Yes: _____	No: _____
James Murdoch:	Yes: _____	No: _____
Kimbal Musk:	Yes: _____	No: _____
Linda Rice:	Yes: _____	No: _____

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D. ALLOCATION OF RESPONSIBILITY

1. For any Defendant whom you found liable in response to questions 1 through 4 in Section A or question 1 in Section C, did that Defendant commit a knowing violation of the federal securities laws? (Do not select "Yes" or "No" for any Defendant whom you did not find liable.)

Elon Musk:	Yes: _____	No: _____
Tesla, Inc.:	Yes: _____	No: _____
Brad W. Buss:	Yes: _____	No: _____
Robyn Denholm:	Yes: _____	No: _____
Ira Ehrenpreis:	Yes: _____	No: _____
Antonio Gracias:	Yes: _____	No: _____
James Murdoch:	Yes: _____	No: _____
Kimbal Musk:	Yes: _____	No: _____
Linda Rice:	Yes: _____	No: _____

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2. Please decide each Defendant's share of responsibility for Plaintiffs' losses. (Only assign a percentage of responsibility to those Defendants whom you found liable. The total must add up to 100%.)

Elon Musk:	_____ %
Tesla, Inc.:	_____ %
Brad W. Buss:	_____ %
Robyn Denholm:	_____ %
Ira Ehrenpreis:	_____ %
Antonio Gracias:	_____ %
James Murdoch:	_____ %
Kimbal Musk:	_____ %
Linda Rice:	_____ %

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E. RETURN OF VERDICT

SIGNED this ____ day of _____, 2023.

PRESIDING JUROR:
